

Court of Common Pleas, Allen County, Lima, Ohio
Courthouse, Lima, Ohio 45801
FAX (419) 222-8427

S U M M O N S O N C O M P L A I N T
Rule 4 1970 Ohio Rules of Civil Procedure

Case No. CV 2021 0191

HONORABLE TERRI L KOHLRIESER

Name	Address	
DIANA AGHDAM	224 SHADY LANE DR BELLEFONTAINE, OH 43311	Plaintiff(s)

-VS-

Name	Address	
ALVIS INC	2100 STELLA CT COLUMBUS, OH 43215	Defendant(s)

To the above named defendant(s); (See attached complaint for additional parties)

You are hereby summoned that a complaint (a copy of which is hereto attached and made part hereof) has been filed against you in this court by the plaintiff(s) named herein. Including the following documents:

You are required to serve upon the plaintiff('s') attorney, or upon the plaintiff(s) if he/she/they has/have no attorney of record, a copy of your answer to the complaint within 28 days after service of this summons upon you, exclusive of the day of service. Said answer must be filed with the court within three days after service on plaintiff('s') attorney.


The name and address of the plaintiff('s') attorney is as follows:

ROYCE A LINK
126 N MAIN AVE
SIDNEY, OH 45365

If you fail to appear and defend, judgment by default will be taken against you for the relief demanded in the complaint.

MARGIE J MURPHY MILLER
Allen County Clerk of Courts

Date: July 7, 2021


Darlene Green Deputy




EXHIBIT A

FILED
COMMON PLEAS COURT

2021 JUL -6 PM 1:41

MARGIE MURPHY HILLER
CLERK OF COURTS
ALLEN COUNTY, OHIO

IN THE COMMON PLEAS COURT OF ALLEN COUNTY, OHIO
CIVIL DIVISION

DIANA AGHDAM
224 Shady Lane Dr.
Bellefontaine, Ohio 43311
Plaintiff

*

Case No.

CV2021 0191

*

WOMLESER

*

v.

COMPLAINT

*

ALVIS INC.
2100 Stella Ct.
Columbus, Ohio 43215
Defendant

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*

Now comes Plaintiff Diana Aghdam, by and through her undersigned legal counsel, and states the following as her Complaint against Defendant Alvis Inc.

FIRST CLAIM FOR RELIEF

1. Plaintiff Diana Aghdam (herein "Aghdam"), is a resident of Bellefontaine, Logan County, Ohio, and Defendant Alvis Inc. (herein "Alvis"), is a corporation conducting business in the State of Ohio, and Allen County, Ohio.

2. Aghdam was employed by Alvis in various roles, including but not limited to being employed as a Director by Alvis at the Allen County, Ohio location. Aghdam was qualified for the position she held with Alvis based upon her skills, experience, and education; and had previously been employed by Allen Correctional Institute, the W.O.R.T.H. Center, and the Juvenile Detention Center in Allen County, Ohio.

EXHIBIT A

3. Aghdam was the Director of twenty-five plus employees as well as numerous volunteers at Ohio Link Lima, a Correctional Halfway House located at 517 S. Main Street, Lima, Ohio which housed more than 65 clients comprised of felony offenders, county probation clients, and city probation clients.

4. Aghdam began her employment with Alvis on or about June 11, 2018, and was terminated from her position based upon her race, gender, religion and in retaliation for engaging in protected conduct on or about September 25, 2019; and throughout the course of her employment, Aghdam was discriminated against and retaliated against based upon her protected status as an African American Christian Woman in a leadership position with the company and based upon protected conduct which she engaged in during the course of her employment; and was ultimately discharged and replaced by individuals not members of the protected classes.

5. Aghdam had received a positive yearly performance review on or about June 26, 2019; and Alvis did not follow its own internal policies and procedures regarding training and progressive discipline during the course of Aghdam's employment with the company.

6. The stated reason for Aghdam's termination was her management style, and said stated reason was pretext for discrimination. Under company policy and in previous instances management style issues were addressed through progressive discipline and through training. Other employees who were terminated without going through progressive discipline were employees who were terminated for serious offenses, such as theft from the company, not for management style.

7. Aghdam is a Christian and was discriminated against after discussing her religious faith with clients and employees of Alvis, her religious faith was a determining factor in her

termination, and the stated reasons for her termination were pretext to discriminate against Aghdam based upon her religion.

8. As a result of the foregoing conduct of Alvis, Aghdam suffered damages, including but not limited to: loss of wages, loss of benefits, physical stress, mental stress, emotional pain and suffering, and other damages to be shown at the ultimate trial of this matter; and Aghdam asserts that she is entitled to punitive damages based upon the conduct of Alvis Inc. herein.

WHEREFORE, Plaintiff Diana Aghdam demands judgment against Defendant Alvis Inc. for an amount in excess of \$25,000.00, punitive damages, interest, costs, and any other relief deemed just and proper.

SECOND CLAIM FOR RELIEF

9. Aghdam hereby restates each and every allegation contained in the first claim for relief as if fully restated herein.

10. Aghdam is African American, and was discriminated against based upon her race by being treated differently than other similarly situated employees who were not members of the protected class during the course of her employment; and Aghdam's membership in the protected class was a determining factor in her termination, and the stated reasons for her termination were pretextual.

11. The discrimination included but was not limited to, interference with Aghdam's management role by allowing subordinates to bypass her and go directly to her superiors and having her leadership undermined by superiors who were not members of the protected class; and by having her employment, discipline, and ultimate termination conducted outside of the policies and protocols of Alvis.

12. As a result of the foregoing conduct of Alvis, Aghdam suffered damages, including but not limited to: loss of wages, loss of benefits, physical stress, mental stress, emotional pain and suffering, and other damages to be shown at the ultimate trial of this matter; and Aghdam asserts that she is entitled to punitive damages based upon the conduct of Alvis Inc. herein.

WHEREFORE, Plaintiff Diana Aghdam demands judgment against Defendant Alvis Inc. for an amount in excess of \$25,000.00, punitive damages, interest, costs, and any other relief deemed just and proper.

THIRD CLAIM FOR RELIEF

13. Aghdam hereby restates each and every allegation contained in the first and second claims for relief as if fully restated herein.

14. Aghdam is a woman, and was discriminated against based upon her gender by being treated differently than other similarly situated employees who were not members of the protected class during the course of her employment, and Aghdam's membership in the protected class was a determining factor in her termination.

15. The discrimination included but was not limited to, interference with Aghdam's management role by allowing subordinates to bypass her and go directly to her superiors; having her leadership undermined by her superiors who were not members of the protected class; and by having her employment, discipline, and ultimate termination conducted outside of the policies and protocols of Alvis.

16. As a result of the foregoing conduct of Alvis, Aghdam suffered damages, including but not limited to: loss of wages, loss of benefits, physical stress, mental stress, emotional pain and suffering, and other damages to be shown at the ultimate trial of this matter; and Aghdam asserts that she is entitled to punitive damages based upon the conduct of Alvis Inc. herein.

WHEREFORE, Plaintiff Diana Aghdam demands judgment against Defendant Alvis Inc. for an amount in excess of \$25,000.00, punitive damages, interest, costs, and any other relief deemed just and proper.

FOURTH CLAIM FOR RELIEF

17. Aghdam hereby restates each and every allegation contained in the first, second and third claims for relief as if fully restated herein.

18. Aghdam had a reasonable belief that the conduct described herein was discrimination, and based upon same, Aghdam made complaints to the human resources department, and to her direct reports, regarding the discrimination described herein.

19. The foregoing protected conduct was a determining factor when Aghdam was discharged, and she was discharged, and other adverse employment actions were taken against Aghdam in retaliation for the complaints which she made to the human resources department and to her direct reports regarding the discrimination against her.


20. Aghdam actively opposed the discrimination and retaliation which was occurring, which included but was not limited to, discussing the discrimination with her direct reports at Alvis and with human resources at Alvis.

21. As a result of the foregoing conduct of Alvis, Aghdam suffered damages, including but not limited to: loss of wages, loss of benefits, physical stress, mental stress, emotional pain and suffering, and other damages to be shown at the ultimate trial of this matter; and Aghdam asserts that she is entitled to punitive damages based upon the conduct of Alvis Inc. herein.

WHEREFORE, Plaintiff Diana Aghdam demands judgment against Defendant Alvis Inc. for an amount in excess of \$25,000.00, punitive damages, interest, costs, and any other relief deemed just and proper.

Respectfully submitted,

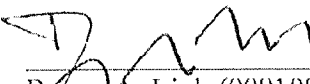
KERRIGAN, BOLLER & LINK CO., L.P.A.



Royce A. Link (0091083)
126 N. Main Ave.,
Sidney, Ohio 45365
Phone: 937-492-6125
Email: roycelink@kerriganboller.com
Attorney for Plaintiff

JURY DEMAND:


Plaintiff hereby demands a trial by jury on all issues so triable herein.



Royce A. Link (0091083)

TO THE CLERK:

Please serve a true and accurate copy of the foregoing on Defendant at the address listed in the caption of the Complaint by certified mail, return receipt requested.



Royce A. Link (0091083)

EXHIBIT A



FILED
COMMON PLEAS COURT

Mailer: Allen County Commissioners (Allen County Courthouse)

2021 JUL 19 PM 4: 11

Date Produced: 07/19/2021

MARGIE MURPHY MILLER
CLERK OF COURTS
ALLEN COUNTY, OHIO

ConnectSuite Inc.:

The following is the delivery information for Certified Mail™/RRE item number 9214 8901 9403 8344 0927 32. Our records indicate that this item was delivered on 07/12/2021 at 10:22 a.m. in COLUMBUS, OH 43215. The scanned image of the recipient information is provided below.

Signature of Recipient :

Address of Recipient :

2100 STELLA CT COLUMBUS,
OH 43215

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

This USPS proof of delivery is linked to the customers mail piece information on file as shown below:

CV 2021 0191
ALVIS INC
2100 STELLA CT
COLUMBUS, OH 43215

Customer Reference Number: C2798325.16103904

Return Reference Number 7104223016901123677

EXHIBIT A

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USPS MAIL PIECE TRACKING NUMBER: 420432159214890194038344092732

MAILING DATE: 07/07/2021

DELIVERED DATE: 07/12/2021

CUSTOM1:

MAIL PIECE DELIVERY INFORMATION:

CV 2021 0191
ALVIS INC
2100 STELLA CT
COLUMBUS, OH 43215

MAIL PIECE TRACKING EVENTS:

07/07/2021 12:51	PRE-SHIPMENT INFO SENT USPS AWAITS ITEM
07/08/2021 21:00	ORIGIN ACCEPTANCE
07/08/2021 22:15	PROCESSED THROUGH USPS FACILITY
07/10/2021 12:31	ARRIVAL AT UNIT
07/12/2021 06:10	OUT FOR DELIVERY
07/12/2021 10:22	DELIVERED FRONT DESK/RECEPTION/MAIL ROOM

LIMA, OH 45802
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EXHIBIT A